

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

Jorge Alejandro Rojas

Plaintiff,

v.

DV Injury Law PLLC, Venar Raad
Ayar, and Daniel P. Heilbrun

Defendants.

Case No. 2:23-cv-12140-LVP-EAS

JURY TRIAL DEMANDED

APPLICATION FOR RELIEF FROM LOCAL RULE 83.20(f)

Plaintiff's counsel, Andrew Roman Perrong, respectfully requests that this Court waive the requirements of Eastern District of Michigan Local Rule 83.20(f), which requires that local counsel be secured.

This is the undersigned's first appearance in the Eastern District of Michigan and the undersigned has no intention of taking any cases in this District in the future. Moreover, this case, which was initially filed *pro se* by the Plaintiff, who is an Illinois resident, was filed after it was dismissed in the Southern District of California for lack of personal jurisdiction. As is indicated by Plaintiff originally proceeding *pro se*, and the relatively small value of this case, the additional burden and expense of securing local counsel is not justified here. Moreover, this particular case is a singularity and does not and will not deprive Michigan attorneys of business in representing Michigan clients.

Furthermore, the claims at issue here arise exclusively under federal question jurisdiction and implicate no questions of state law whatsoever, let alone Michigan law. The undersigned has extensive experience in the Federal Telephone Consumer Protection Act, the statute at issue here. Any briefing in this case will concern federal law and case law. In sum, the undersigned has the requisite experience and expertise required to represent the Plaintiff adequately and effectively. The undersigned remains ready, willing, and able to attend in-person hearings and appearances in Michigan as ordered by this Court as Local Rule 83.20(f)(2) requires. Moreover, the undersigned has reviewed and will comply with all applicable Local Rules.

For the foregoing reasons, the undersigned respectfully requests that this Court relieve him of the obligation to specify local counsel and permit him to represent the Plaintiff without local counsel in this matter.

RESPECTFULLY SUBMITTED AND DATED this November 21, 2023.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq. (PA Bar # 333687)
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, Pennsylvania 19038
Phone: 215-225-5529 (CALL-LAW)
Facsimile: 888-329-0305
a@perronglaw.com

Attorney for Plaintiff